

# NRC INSPECTION MANUAL

---

## PART 9900: TECHNICAL GUIDANCE

---

STS6511.TG

### STANDARD TECHNICAL SPECIFICATIONS SECTION 6.5.1.1 LICENSEE REVIEW RESPONSIBILITY FOR MATTERS RELATED TO NUCLEAR SAFETY

#### A. PURPOSE

To provide guidance to the Inspector concerning the NRC intent of Item 6.5.1.1 of the Standard Technical Specifications as well as a number of custom technical specifications which state that the unit review group (on-site committee) shall function to advise the plant superintendent on all matters related to nuclear safety.

#### B. DISCUSSION

In order for the committee to satisfy this function, it must act on all matters that affect nuclear safety and the action must be documented to conform with specifications 6.5.1.7 and 6.5.1.8. It should be noted that the committee itself is not required to conduct a detailed review of the issues; rather, the committee may assign preliminary review responsibility to a qualified individual or a subcommittee; the extent of the committee review effort would depend on the complexity of the recommendation.

In practice, the on-site committee is responsible for the review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety. It is the NRC position that this requirement applies to all proposed changes or modifications that can affect the safety related functions of plant structures, systems and components. Such changes and modifications can involve plant systems and equipment which are not required to be covered by the quality assurance program. Regardless of the components or systems involved, changes or modifications that can affect safety-related functions must be subjected to on-site committee action.

An example of equipment that is not covered by the QA Program could involve a facility modification to install roof drain piping over electrical equipment that has a safety function. If flooding of the electrical equipment challenges its capability to perform the intended safety function, a review is required. As noted above, the review may be performed by a designated group or an individual but that review must be formally acted on by the on-site committee and this action must be documented in minutes of the committee meetings.

Committee action must be completed before the change/modification takes place just as committee action is taken before a changed procedure is implemented.

Conversely, certain proposed changes and modifications to plant structures, systems and components having a safety-related function (subject to QA controls) do not require action by the on-site committee when such changes/modifications do not affect the safety-related function. An example would be a proposed modification to add a pipe cap at the open end of a double-valved 3/4-inch test line used to periodically test the leak-tightness of containment isolation valves. In addition, the on-site committee review requirement does not apply to routine maintenance activities conducted in accordance with previously approved procedures. Furthermore, components and equipment having a safety-related function which have performed satisfactorily in service are often "replaced-in-kind" when damaged, worn, or for similar reasons. Such "replacements-in-kind" do not require committee review when the requirements of those drawings, specifications, and procedures applicable to the component or equipment being replaced are met. Other "replacements-in-kind", require committee action to ensure equivalence has been determined through proper engineering evaluation.

In summary, the on-site committee may assign preliminary review responsibility to a qualified individual or a subcommittee who must make a determination as to whether or not the proposed change reasonably could have any effect on safety. If the determination is yes, the change must be reviewed by the on-site committee. On the other hand, if the determination is no, the change does not have to be reviewed by the on-site committee.

The on-site committee should develop appropriate administrative controls which address the authority of and provide guidance for the individual or subcommittee members. The controls should also include provisions to assure that all changes that have an effect on safety are identified for review by the full committee. This latter action may take the form of periodic audits, etc.

This position does not address the need or scope of reviews that are required by 10 CFR 50.59. Guidance on 10 CFR 50.59 is provided in the 10 CFR interpretations section of the IE Manual.

#### C. REFERENCE

Memorandum, J. H. Sniezek to R. H. Engelken and N. C. Moseley, dtd October 5, 1981

END